TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 506	TPA CHANGE NOTICE FORM	Date: 4/23/12
Document Number, Title, and Revision: DOE/RL-2004-30, *Waste Control Plan for the 100-BC-5 Operable Unit*, Revision 1		Date Document Last Issued: 05/2005
Originator: R. W. Oldham		Phone: 372-2426

Description of Change:
The BC-5 Waste Control Plan is being modified to update the Investigation Derived Waste (IDW) Strategy reference to be consistent with the 2011 revision, and to clarify the accumulation start date for the 12 month storage limit once IDW is placed in a container.

B. L. Charboneau and L. C. Buelow, EPA agree that the proposed change
DOE **Lead Regulatory Agency**
modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records,* and not Chapter 12.0, *Changes to the Agreement.*

The sections of DOE/RL-2004-30, *Waste Control Plan for the 100-BC-5 Operable Unit*, Revision 1, that pertain to this change are the sections regarding management of purgewater, decontamination fluids, packaging and labeling, storage/transportation and references. These sections are found on pages 4, 5 and 6 of DOE/Rl-2004-30, Revision 1. Revised pages 4-6 are attached to this change notice.

Deleted text is indicated below with ~~single line strike through~~, and added text is indicated with underline.

Page 4, Purgewater... All purgewater will be managed in compliance with the ~~Strategy for Handling and Disposing of Purgewater at the Hanford Site (Strategy), found in Appendix F of the Tri Party Agreement (Ecology et al. 1989).~~ Hanford Strategy for Management of Investigation Derived Waste, DOE/RL-2011-41 (Strategy 2011).

Page 4, Decontamination Fluids...generated from cleaning equipment and tools in the operable unit may be discharged to the ground if it is below the purgewater collection criteria contained in the Strategy 2011 ~~(Appendix F, Ecology et al. 1989)~~ (section 10, Groundwater Discharge Guidelines).

Description of Change continues on page 2
Replacement pages (clean version of document pages 4-6) Attached

Justification and Impacts of Change:
Discussions and agreement with EPA required document clarification regarding the accumulation period.

Approvals:

DOE Project Manager	4-23-12 Date	X Approved [ ] Disapproved
EPA Project Manager	4-23-12 Date	X Approved [ ] Disapproved
N/A Ecology Project Manager	Date	[ ] Approved [ ] Disapproved

Description of Change, continued

Page 5, Packaging and Labeling... Container packaging and labeling will be in accordance with Section 7.2 of the ~~IDW strategy (DOE 1999)~~ Strategy 2011.

Page 5, Storage/Transportation... Waste will be stored at the location identified in Attachment 2 pending appropriate disposal and managed in accordance with section ~~7.2 of the IDW strategy (DOE 1999)~~ 7 of the Strategy 2011... ...Section 9.0 of the ~~IDW strategy (DOE 1999)~~ strategy 2011 states that on a case-by-case basis, the project managers may negotiate exceptions to the requirements identified in the strategy. ...EPA has agreed that waste associated with the 100-BC-5 Operable Unit may be stored for up to 12 months, measured from the time the waste is first placed in the container.

Page 6, References

~~DOE. 1999. *Environmental Restoration Program Strategy for Management of Investigation Derived Waste.*~~

DOE/RL-2011-41, Revision 0, *Hanford Strategy for Management of Investigation Derived Waste. U.S. Department of Energy, Richland Operations Office, Richland, Washington.*

ATTACHMENT 1

identified for decommissioning, the well list (Attachment 3a) will be revised, distributed at the 100 Area Unit Manager's Meeting (UMM), and entered into the Administrative Record via the UMM minutes.

Drill Cuttings

Drill cuttings (soils and slurries) from outside an area of known or suspected contamination will be collected in stockpiles near the point of generation. Soils and slurries from known or suspect contaminated areas will be placed on a tarp or in containers. Contained soil slurries will be decanted and free liquids remaining in the container will be eliminated by evaporation and/or the addition of absorbent material prior to disposal, as necessary. Decanted water will be managed as purgewater. Soils and slurries may be placed on the ground near the point of generation if they meet the following criteria:

- soil cleanup criteria in the Record of Decision (EPA 1999)
- not designated as a dangerous waste,
- below Washington Administrative Code (173-340-740) soil cleanup standards
- radiologically released

If the drill cuttings do not meet those criteria, with the approval of the lead regulatory agency they may be placed on the ground if the site is scheduled for subsequent remediation.

Decanting slurries and eliminating free liquids is authorized without prior approval.

Purgewater

All purgewater will be managed in compliance with the *Hanford Strategy for Management of Investigation Derived Waste*, DOE/RL-2011-41 (Strategy 2011). Purgewater that exceeds the collection criteria contained in the Strategy 2011 will be collected, and contained at the well head if necessary, until transported to the Purgewater Storage and Treatment Facility (PSTF) or the Effluent Treatment Facility (ETF), or other facility as authorized by the regulatory agency. Purgewater below the collection criteria may be discharged to the ground near the point of generation, avoiding known or suspected surface/vadose zone contamination.

Decontamination Fluids

Decontamination fluids (water and/or non-hazardous cleaning solutions) generated from cleaning equipment and tools in the operable unit may be discharged to the ground if it is below the purgewater collection criteria contained in the Strategy 2011 (section 10, Groundwater Discharge Guidelines). Decontamination fluids above the collection criteria will be contained and transported to the PSTF, ETF (if the waste acceptance criteria can be met), or other facility as authorized by the regulatory agency. Small volumes of decontamination fluids may be stabilized to eliminate free liquids and then disposed to ERDF provided the waste acceptance criteria can be met.

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Decontamination of some equipment may be conducted at either the 600 Area centralized location and/or the Waste Sampling and Characterization Facility (WSCF) because decontamination and containment systems are already established at these locations. The waste generated at these facilities is not considered IDW and will be managed in accordance with applicable regulations and the facilities' waste management procedures.

Analysis Screening Fluids

Unaltered liquid waste generated during screening analysis may be managed as purgewater as described above. Altered sample wastes will be disposed to ETF, ERDF, or other appropriate facility as authorized by the regulatory agency depending on the waste designation. Some liquids may be neutralized and/or stabilized to meet disposal facility waste acceptance criteria.

PACKAGING AND LABELING

Materials requiring collection will generally be placed in drums. However, packaging for large or irregular shaped IDW (e.g., well casing) may include containment other than drums. The packaging shall provide insurance against migration of contaminants and protection from environmental degradation. The packaging may include, but is not limited to, plastic wrap.

Low-volume miscellaneous materials associated with activities such as groundwater well sampling, water level measurements, and groundwater well maintenance may be bagged, taped and labeled with the well number at the wellhead. The bagged material will be transported in a protective manner (i.e., containment of the material is maintained) with the workers while proceeding from well to well in the operable unit. Upon arrival at the storage location, the materials will be placed in an accumulation container and managed as waste. The material may also be taken directly to ERDF for disposal, if appropriate, without storage.

Container packaging and labeling will be in accordance with Section 7.2 of the Strategy 2011.

STORAGE/TRANSPORTATION

Waste will be stored at the location identified in Attachment 2 pending appropriate disposal and managed in accordance with Section 7 of the Strategy 2011. Some waste (e.g., field decontamination fluids) may be temporarily (generally less than 2 weeks after generation) accumulated near the point of generation in the 100-BC-5 Area, then staged at the centralized container storage location. Waste will be transported in accordance with WAC 173-303 and U.S. Department of Transportation requirements as appropriate.

Much of the IDW is generated in small quantities on an ongoing basis. The IDW strategy allows waste to be stored for up to 6 months. An extension is required for storage beyond 6 months. Section 9.0 of the Strategy 2011 states that on a case-by-case basis, the project managers may negotiate exceptions to the requirements identified in the strategy. Because of the low volumes of waste generated, EPA has agreed that waste associated with the 100-BC-5 Operable Unit may be stored for up to 12 months, measured from the time the waste is first placed in the container.

ATTACHMENT 1 (cont.)

REFERENCES

DOE/RL-2003-38, Rev. 1. 2004. *100-BC-5 Operable Unit Sampling and Analysis Plan*. U. S. Department of Energy, Richland Operations Office, Richland, Washington.

DOE/RL-2011-41, Revision 0, *Hanford Strategy for Management of Investigation Derived Waste*. U.S. Department of Energy, Richland Operations Office, Richland, Washington.

Ecology - Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy. 1989. *Hanford Federal Facility Agreement and Consent Order*. Document No. 89-10, as amended, (The Tri-Party Agreement), Olympia, Washington.

EPA, 1999, as amended. *Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units*, Hanford Site, Benton County, Washington. U.S. Environmental Protection Agency, Region 10, Seattle, Washington.

WAC 173-303. *Dangerous Waste Regulations*. Washington Administrative Code, Olympia, Washington.

WAC 173-340-740. *Unrestricted Land Use Soil Cleanup Standards*. Washington Administrative Code, Olympia, Washington.

This page change was approved under TPA-CN-506